

1 REBECCA L. MASTRANGELO, ESQ.
 2 Nevada Bar No. 5417
 3 ROGERS, MASTRANGELO, CARVALHO & MITCHELL
 4 700 S. Third Street
 5 Las Vegas, NV 89101
 Telephone: (702) 383-3400
 Facsimile: (702) 384-1460
rmastrangelo@rmcmlaw.com

6
 7 Su-Lyn Combs (*pro hac vice*)
 TUCKER ELLIS LLP
 8 515 South Flower Street
 Forty-Second Floor
 9 Los Angeles, CA 90071
 Telephone: (213) 430-3400
 10 Facsimile: (213) 430-3409
su-lyn.combs@tuckerellis.com

11
 12 TUCKER ELLIS LLP
 V. SATHIENMARS SBN 282619
v.sathienmars@tuckerellis.com
 13 201 Mission Street
 Suite 2310
 14 San Francisco, CA 94105-1839
 Telephone: 415.617.2400
 15 Facsimile: 415.617.2409

16 Attorneys for Defendant
 17 *OTIS ELEVATOR COMPANY*

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20
 21 MANSOUR AFSHARALMANCHI, an
 individual,

22 Plaintiff,

23 v.

24
 25 OTIS ELEVATOR COMPANY; a Foreign
 Corporation; DOES I through X; and ROE
 26 CORPORATIONS I through X, inclusive;
 Defendants.

27
 28 EJY
 CASE NO.: 2:24-cv-02178-JAD-~~NJK~~

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY PLAN AND
 SCHEDULING ORDER**

(First Request)

1 COMES NOW, Plaintiff MANSOUR AFSHARALMANCHI, by and through his attorneys
 2 of record, the law firm HEIDARI LAW GROUP and Defendant OTIS ELEVATOR COMPANY
 3 by and through its counsel of record, the law firms ROGERS, MASTRANGELO, CARVALHO,
 4 AND MITCHELL and TUCKER ELLIS LLP, and hereby request the discovery deadlines in the
 5 previously filed Order [Doc 11] be extended by ninety (90) days, pursuant to FRCP 29 and LR 26.4,
 6 as follows:

7 **A. DISCOVERY COMPLETED TO DATE**

- 8 • The parties have conducted a FRCP 26(f) conference;
- 9 • The parties have served their respective FRCP 26(a) disclosures;
- 10 • Defendant has served upon Plaintiff one set of Requests for Production and one set of
 Interrogatories. Plaintiff has responded.;
- 11 • Plaintiff provided provider specific authorizations;
- 12 • Defendant served a Subpoena Duces Tecum on Venetian Las Vegas Gaming, LLC and
 obtained documents, photographs, and video surveillance.

13 **B. DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF
 DISCOVERY**

17 Discovery to be completed includes:

- 18 • Obtain Plaintiff's relevant medical provider records from numerous medical providers;
- 19 • Coordinate and schedule a site inspection of the Subject Elevator;
- 20 • Defendant needs to depose Plaintiff;
- 21 • Defendant needs to depose other occupants in the elevator at the time of the Subject
 Incident;
- 22 • Defendant need to conduct expert discovery on Plaintiff, inclusive of, e.g., Rule 35
 examination(s);
- 23 • Depositions of numerous expert witnesses and rebuttal expert witnesses;
- 24 • Depositions of Plaintiff's treating physicians; and
- 25 • Additional written discovery and depositions as necessary.

28 The parties agree, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

1 Plaintiff Mansour Afsharalmanchi alleges serious injuries and other related damages as a result of
 2 an alleged elevator drop on August 3, 2022 at The Venetian Hotel. There were 15 other hotel
 3 employees in the elevator with him. On May 20, 2024, Alma Vargas, one of thee passengers on the
 4 elevator with Plaintiff, filed a Complaint in the Eighth Judicial District Court for Clark County
 5 alleging identical causes of action against Defendant. Otis filed a Notice of Removal for Alma
 6 Vargas; however the case was remanded for lack of subject matter jurisdiction. (*See*, 2:24-cv-01148
 7 [Doc 12]. The parties have been working diligently to complete discovery in this matter, along with
 8 the Vargas matter, but there is some overlap in the discovery for both cases. Specifically, due to
 9 logistical challenges in scheduling depositions of fact witnesses and a site inspection in both cases,
 10 additional time is required. A brief extension in the current discovery plan would assist in ensuring
 11 a comprehensive and equitable discovery process.

12 **C. PROPOSED PLAN FOR COMPLETING DISCOVERY**

Event	Current Deadline	Proposed Deadline
Amending the Pleadings and Adding Parties	March 26, 2025	June 24, 2025
Initial Expert Disclosure	April 27, 2025	August 25, 2025
Rebuttal Expert Disclosures	May 27, 2025	September 25, 2025
Discovery Cut-Off Date	June 24, 2025	October 22, 2025
Dispositive Motions	July 24, 2025	November 21, 2025
Joint Pre-Trial Order, if No Dispositive Motions	August 25, 2025	December 22, 2025

23 **D. THE CURRENT TRIAL DATE**

24 This matter has not been scheduled for trial.

25 **E. NUMBER OF REQUESTS FOR EXTENSION**

26 This is the first request to extend discovery deadlines.

1 Dated this 11th day of March, 2025
2

3 HEIDARI LAW GROUP, PLLC
4

5 */s/ Sam Ryan Heidari*
6 SAM RYAN HEIDARI, ESQ.
7 Nevada Bar No. 13347
8 611 South 6th Street
9 Las Vegas, NV 89101
10 *Attorneys for Plaintiff*

Dated this 11th day of March, 2025

ROGERS, MASTRANGELO, CARVALHO
& MITCHELL

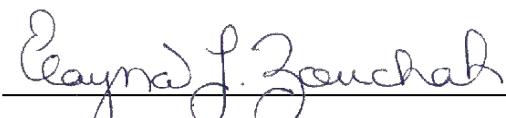
/s/ Rebecca L. Mastrangelo
REBECCA L. MASTRANGELO, ESQ.
Nevada Bar No. 5417
700 South 3rd Street
Las Vegas, NV 89101
*Attorneys for Defendant Otis Elevator
Company*

11 Dated this 11th of March, 2025

12 TUCKER ELLIS LLP

13 */s/ Su-Lyn Combs*
14 SU-LYN COMBS, ESQ. (*Pro Hac Vice*)
15 515 South Flower Street
16 Forty-Second Floor
17 Los Angeles, CA 90071
18 *Attorneys for Defendant Otis Elevator
Company*

19 IT IS SO ORDERED

20 
21 United States Magistrate Judge

22 DATED: March 11, 2025

TUCKER ELLIS LLP
Cleveland ♦ Columbus ♦ Denver ♦ Los Angeles ♦ San Francisco